Shara file bcc ~~C. P.~~ Barton
D. Wood

219-637-6264
called on 8/21 to offer more info to Dustin, passed on to author of resolution.

Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 694-[illegible]

PCB File

July 18, 1978

10/3 Mr. Block has not yet responded. Issue will be covered in Dec. quarterly.

Mr. Thomas Dustin
Executive Director
Izaak Walton League
1802 Chapman Rd.
Huntertown, IN 46748

Dear Mr. Dustin:

I appreciate the opportunity to respond to your Izaak Walton League members about the inaccuracies in your June 11, 1978, press release. I believe Monsanto has acted in a completely socially responsible manner throughout our history of PCB manufacturing and our exit of the business in 1977.

Let me refute the inaccuracies first. Monsanto does not continue production or distribution of PCBs. Our production ceased in July 1977, and we had completely distributed inventory and exited the business by October 1977. While at least four different countries today produce PCBs, there are no Monsanto PCBs being produced or sold in the United States or anywhere on the globe.

There is no evidence that PCBs cause cancer. PCBs have a very low acute toxicity to man. The primary concern over PCBs involves their persistence in the environment and their build-up in the food chain. The National Cancer Institute announced in the April 21, 1978, Federal Register the results of their two-year feeding study. Their finding was, "According to a summary of the report included in the announcement, Aroclor 1254 (PCB) was not carcinogenic to the rats under the test conditions." These are the medical facts.

Whether Monsanto has acted in a socially responsible manner with PCBs or whether your league's citation that Monsanto's continued manufacture of PCBs was the "most flagrant example of irresponsible chemical contamination of the past decade" is a matter of opinion on both our parts. Let me review just a bit of the background on PCBs and summarize the major chronology of the business. Then, let your members draw their own conclusions as to these divergent viewpoints.

MONS 000795

PCBs were first manufactured in 1929 to provide a fire-resistant dielectric fluid for the electrical industry. In the late '60s, findings by a Swedish biologist reported the build-up of PCB-type material in fish. Monsanto helped develop analytical methods to isolate PCB from the other chlorinated hydrocarbons, like DDT. We began in 1970 to restrict sales to areas where PCB were sealed or closed in a system, such as transformers and capacitors. We improved housekeeping at our plant with a number of significant steps to prevent PCB loss to the environment. These voluntary steps, plus changes in labeling and transportation practices were endorsed and supported in 1972 by a Federal Task Force (consisting of the Office of Science and Technology, Council on Environmental Quality, Department of Agriculture, Department of Commerce, the EPA, HEW and the Department of the Interior).

We also started looking for replacement products for PCB that would offer environmental compatibility with the same fire-resistant properties the electric industry needed. During a 1975 press conference, then EPA Administrator, Russell Train said he would not ask us to stop production because that would shut down the electric power industry and the railroads in short order. He said we must find a way to proceed without shutting down the country. However, by 1976 it was clear commodity-type materials such as silicones and phthalate esters would do the job. Monsanto announced in 1976 that we would completely exit the business by October 1977 giving our customers time to convert their manufacturing facilities to the commodity-type dielectric fluids. And we did shut down, on schedule.

In addition to ongoing studies in Japan, Canada and the U.S. to develop bacteria to break down persistent PCBs in the environment, Monsanto has initiated programs through Monsanto research funding to two universities to identify innovative and practical approaches to the removal of PCBs from the environment.

I'll summarize by saying we rapidly responded to the environmental message that PCBs were persistent in the environment. We finally exited the business with the realization that PCBs' historical benefit to mankind no longer balanced the newly discovered risks to our environment.

I enjoyed talking with you the other day and am respectful of your knowledge of PCBs and concern for our environment. That we both share. Thanks for the opportunity to pass along my viewpoint.

Sincerely,

R. C. Isham

R. C. Isham
Director, Advertising
and Public Relations
(Extension 2621)

RCI:smt
Att.